

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION**

**In re:**

**SEA ISLAND COMPANY et al.,**

**Debtors.**

**SEA ISLAND ACQUISITION, LLC,  
SEWERS AND WELLS, LLC,  
MAINTENANCE FACILITY, LLC,  
LAUNDRY SERVICES, LLC, RAINBOW  
HAMMOCK, LLC, SIA PROPCO I, LLC,  
SIA PROPCO II, LLC, SI TRACT V, LLC,  
SI PARCEL OGC, LLC, AND SSI  
PARCEL OS, LLC,**

**Plaintiffs,**

**v.**

**ROBERT H. BARNETT, as Trustee of the  
SEA ISLAND COMPANY CREDITORS  
LIQUIDATION TRUST,**

**Defendant.**

**Chapter 11  
Case No. 10-21034-EJC  
Jointly Administered**

**Adversary Proceeding**

**No. 18-02012-EJC**

**MOTION FOR STATUS CONFERENCE AND REQUEST TO SET TRIAL DATES**

Plaintiff Sea Island Acquisition, LLC (“SIA”) and the other plaintiffs party to this adversary proceeding (together with SIA, the “Plaintiffs”) by and through the undersigned counsel, hereby move, pursuant to Federal Rule of Civil Procedure (“FRCP”) 16(a) and (b), made applicable by Federal Rule of Bankruptcy Procedure (“FRBP”) 7016, for the Court to set a status conference to address pretrial scheduling and to set this case for trial on December 19-20, 2018, respectfully showing the Court as follows:

1. The Court held a hearing on Plaintiffs' motion for preliminary injunction on October 30, 2018. The Court entered a preliminary injunction order and expressed a willingness and desire to try this case to conclusion in December 2018. Plaintiffs share that desire and prefer strongly that this case not linger or that a final resolution be delayed unnecessarily. Plaintiffs believe that the issues are relatively narrow and can easily be prepared fully for trial in 30 days.

2. Plaintiffs understand that December 19 and 20 are currently available on the Court's calendar (although Plaintiffs are advised that December 20 currently has a Chapter 7 docket that will require a break in any proceedings in this case if set for that date). Plaintiffs are confident that the time available on December 19 and 20 should be easily sufficient to try the case to the Court.

3. Plaintiffs personnel and its counsel are available on those dates and desire to go forward on December 19 and 20. Plaintiffs are confident that all necessary discovery and other pretrial procedures can be completed in time to try this case beginning on December 19.

4. Plaintiffs' counsel have advised Defendant's counsel of the availability of the December dates, and is prepared to work with Defendant and its counsel to ensure that all necessary discovery and other pretrial procedures are completed fully in advance of trial. Among other things, Plaintiffs are prepared to produce documents, provide access to property, and arrange for depositions, as quickly as possible – all of which Plaintiffs believe can be accomplished over the next 2 to 3 weeks.

5. Counsel for Plaintiffs and Defendants have had preliminary discussions concerning scheduling, and Defendant has not agreed to the December trial dates or to a pretrial schedule. Nonetheless, Plaintiff is hopeful that an agreement can be reached on these issues and

that an agreed scheduling order can be delivered to the Court during the week of November 5, 2018.

6. Plaintiffs request that the Court schedule a status conference (either in person or telephonic, at the Court's preference) on November 7, 8 or 9, so that the Court can supply guidance on any scheduling issues that have not yet been agreed to by the parties to that point, so that by the Friday, November 9, the parties will be operating under a Court-approved schedule that will lead up to a trial beginning on December 19.

7. FRCP 16, which is applicable to this Case by FRBP 7016, authorizes the Court to schedule a status conference for the purpose of expediting the disposition of an action (FRCP 16(a)(1)) and to enter a scheduling order after consulting with the parties at a scheduling conference (FRCP 16(b)(1)(B)). Plaintiff submits that the circumstances are appropriate for the Court to set the above-requested conference, and grant the relief set forth herein.

WHEREFORE, for the reasons set for the above, Plaintiffs request that the Court set a status conference on either November 7, 8, or 9, to discuss and resolve any scheduling issues necessary to finalize a pretrial schedule in this case; that the Court set this case for trial for December 19 and 20; and that the Court grant such further relief as the Court deems appropriate.

Respectfully submitted this 2nd day of November, 2018.

HALL BOOTH SMITH, P.C.

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